

Ryan P. Poscablo
+1 212 506 3921 direct
rposcablo@steptoe.com

Steptoe

1114 Avenue of the Americas
New York, NY 10036-7703
212 506 3900 main
www.steptoe.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 6/22/22

June 10, 2022

Via ECF and E-Mail

Hon. Andrew L. Carter
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Barend Oberholzer*, 1:21-cr-00475-ALC

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to respectfully request permission for Mr. Oberholzer to travel with his family for family vacation to Key Biscayne, Florida, leaving on June 29 and returning July 9, 2022, and to Ko'Olina, Hawaii, leaving on August 5 and returning August 14, 2022.

Pretrial Services, by PTSO Dominique Jackson, takes no position on Mr. Oberholzer's application. The government, by AUSA Jilan Kamal, has no objection to Mr. Oberholzer's application. If approved, Mr. Oberholzer would purchase the tickets and provide Pretrial Services with an itinerary of his trip. By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500K personal recognizance bond secured by two financially responsible persons, with conditions including, inter alia, that Mr. Oberholzer's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, Mr. Oberholzer has remained compliant with the conditions of his release.

We thank the Court for its consideration in this matter.

Hon. Andrew L. Carter
Page 2 of 2
June 10, 2022

Respectfully submitted,

/s/ Ryan P. Poscablo

Ryan P. Poscablo, Esq.

cc: Jilan Kamal, Esq., Assistant United States Attorney (by ECF)
Dominique Jackson, Pretrial Services (by email)

So Ordered:

A handwritten signature in black ink, appearing to read "Andrew L. Carter, Jr.", written over a horizontal line.

Hon. Andrew L. Carter, Jr. 6/22/22